



November 12, 2014

Richard D. Valentine
President
Culver-Stockton College
One College Hill
Canton, MO 63435-1299

UPS Tracking #: 1ZA879640293449085

RE: **Final Program Review Determination**
OPE ID: 00246000
PRCN: 201330728274

Dear President Valentine:

The U.S. Department of Education's (Department's) School Participation Division – Kansas City issued a program review report on May 6, 2014 covering Culver-Stockton College's (CSC) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2011-2012 and 2012-2013 award years. CSC's final response was received on July 29, 2014. A copy of the program review report (and related attachments) and CSC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Southwest upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, and (3) notify the institution of its right to appeal

The total liabilities due from the institution from this program review are **\$13,517.00**

This final program review determination contains detailed information about the liability determination for all findings.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals

Federal Student Aid

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School Participation Division – Kansas City

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and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. In addition, Appendices B, C, and E also contain PII.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the May 6, 2014 program review report. If CSC wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date CSC receives this FPRD. An original and four copies of the information CSC submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

CSC's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to CSC's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(c)(1), (e)(2), and (c)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Mr. Jim Wyant at 816-268-0431. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Ralph A. LoBosco
Division Director

Enclosure:
Protection of Personally Identifiable Information

cc: Tina Wiseman, Financial Aid Administrator
David K. Russell, Commissioner, Missouri Coordinating Board for Higher Education
Sylvia Manning, President, North Central Association of Colleges and Schools
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
Culver-Stockton College

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OPE ID: 00246000
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Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division – Kansas City

Final Program Review Determination
November 12, 2014

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Culver-Stockton College

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A. Institutional Information

Culver-Stockton College
One College Hill
Canton, MO 63435-1299

Type: Private nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: North Central Association of Colleges and Schools

Current Student Enrollment: 752

% of Students Receiving Title IV: 86% (2011–2012)

Title IV Participation: (Source G5)

2011-2012 Award Year

Federal Pell Grant	\$1,603,754.00
Federal Supplemental Education Opportunity Grant	\$ 122,328.00
Federal Work-Study	\$ 82,247.00
Federal Direct Subsidized Loan	\$2,108,915.00
Federal Direct Unsubsidized Loan	\$2,268,520.00

Default Rate FFEL/DL:	2010: 7.2%
	2009: 7.1%
	2008: 6.1%

Default Rate Perkins:	06/30/2012: 36.6%
	06/30/2011: 27.5%
	06/30/2010: 21.9%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Culver-Stockton College (CSC) from May 13, 2013 to May 17, 2013. The review was conducted by Mr. Jim Wyant, Ms. Rhonda Puffer, and Ms. Angela Beam.

The focus of the review was to determine CSC's compliance with the statutes and federal regulations as they pertain to the institution's administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. The review consisted of, but was not limited to, an examination of CSC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011–2012 and 2012–2013 (year to date) award years. An additional, 7 files from 2011-2012 and 8 files from 2012-2013 were selected to adequately review administration of Federal Work Study (FWS), Federal Supplemental Opportunity Grant (FSEOG), Federal Perkins Loans, and Returns. The student files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A identifies the students whose files were examined during the program review. A Program Review Report was issued on May 6, 2014.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning CSC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, the review does not relieve CSC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Findings and Final Determinations

Resolved Findings

Findings 3-12

CSC has taken the corrective actions necessary to resolve Findings 3-12 of the program review report. Therefore, these findings may be considered closed. CSC's response to the program review report resolving these issues can be found in Appendix D

Findings requiring further action by CSC are discussed below.

Finding with Final Determinations

The program review report findings requiring further action are summarized below. At the conclusion of each finding is a summary of CSC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on May 6, 2014, is attached as Appendix C.

Finding 1. Enrollment Status Not Verified Before Disbursement

Citation: *If the student's enrollment status changes from one academic term to another term within the same award year, the institution shall recalculate the Federal Pell Grant award for the new payment period taking into account any changes in the cost of attendance. If the student's projected enrollment status changes during a payment period after the student has begun attendance in all of his or her classes for that payment period, the institution may establish a policy under which the student's award for the payment period is recalculated. Any such recalculations must take into account any changes in the cost of attendance. If such a policy is established, it must apply to all students. If a student's projected enrollment status changes during a payment period before the student begins attendance in all of his or her classes for that payment period, the institution shall recalculate the student's enrollment status to reflect only those classes for which the student actually began attendance. 34 C.F.R. § 690.80(b).*

Noncompliance: *CSC failed to recalculate Federal Pell Grant awards if a student did not begin attendance in all of his or her courses. CSC did not have a mechanism in place to verify enrollment until the end of the term.*

During the review, program reviewers identified three students who received Federal Pell Grant Program funds in excess of the enrollment status established on the student's academic transcript. CSC was unable to provide documentation that reflected the students began attendance in one or more courses before withdrawing.

Student #19: The student enrolled in 12 hours for the Fall 2011 semester which spanned from August 22, 2011 to November 18, 2011. The student received a Federal Pell Grant award based on a full time enrollment status in the amount of \$2,775.00. The student withdrew from all classes August 30, 2011; however, there was no documentation that reflected the student began attendance in one or more courses before withdrawing.

This student is also cited in Findings 2, 5, and 12.

Student #28: The student enrolled in 15 hours for the Spring 2013 semester, which spanned from January 14, 2013 to May 18, 2013. CSC awarded the student with a Federal Pell Grant award of \$1,750.00, based on full-time enrollment and a 2039 EFC. The student's academic transcript reflects a "F" grade for 11 hours in which he was enrolled during the 12-week session in the Spring 2013 semester which spanned from January 14, 2013 until April 19, 2013, and a "W" for 4 hours the student was scheduled to attend in the subsequent 3-week session in the Spring 2013 semester which spanned from April 24, 2013 until May 18, 2013. Based on the "Final Grade of 'F' in Classes Due to Non Attendance" report for the student that CSC provided after the review, the student's last documented date of attendance was March 20, 2013, and only began attendance in 10 of the 15 scheduled credit hours. The student was only eligible to receive a three-quarter time Federal Pell Grant disbursement of \$1,313.00; thus the student received ineligible Federal Pell Grant funds in the amount of \$437.00.

Student #41: The student enrolled in 14 hours for the Spring 2013 semester, which spanned from January 14, 2013 to May 18, 2013. The student received \$2775.00 in Federal Pell Grant funds. The academic transcript reflects 11 hour in which he was enrolled during the 12-week session in the Spring 2013 semester which spanned from January 14, 2013 until April 19, 2013, and the student's schedule shows 3 hours of enrollment in the subsequent 3-week session in the Spring 2013 semester which spanned from April 24, 2013 until May 18, 2013. The student officially withdrew March 13, 2013, and only began attendance in 11 of 14 scheduled hours. Based on the change in enrollment status, the student was only eligible to receive a three-quarter time Federal Pell Grant disbursement of \$2,081.00; thus, the student received ineligible Federal Pell Grant funds in the amount of \$694.00.

This student is also cited in Findings 2, 8, and 12.

Failure to Pay Pell Eligible Students

CSC did not follow the Title IV, HEA regulatory requirements associated with the administration of Federal Pell Grant Program funds resulting in the institution's failure to pay all eligible students. On a systemic basis, CSC did not award or disburse Federal Pell Grant Program funds to students with an enrollment status of less-than-half-time.

Inconsistent Recalculation of Federal Pell Grant Awards

CSC was adjusting Federal Pell Grant awards during the semester for the two eight-week courses; however, CSC was not adjusting Federal Pell Grant awards for other schedule changes after the add/drop period. If an institution establishes a date after which a Federal Pell Grant is no longer recalculated, this date must be applied consistently to all students.

Required Action: *CSC must develop internal policies and procedures that require faculty members to report students who fail to begin attendance in a course to the Financial Aid Office in an accurate and timely manner. These procedures must outline the institution's procedures for resolving conflicting information and for documenting a student's last date of attendance, as well as for adjusting Title IV, HEA program disbursements within regulatory deadlines. Additionally, CSC must review and revise its internal policy and procedures to ensure that Federal Pell Grant funds are re-calculated in a timely manner in the future and that CSC appropriately awards and disburses Federal Pell Grant funds to all eligible students. A copy of these procedures must accompany CSC's response to this report.*

In addition, CSC must review the enrollment records of all Federal Pell Grant recipients during the 2011–2012 and 2012–2013 award years and who failed to earn a passing grade in one or more courses (grades of W, I, FN, F, etc.) or failed to attend a course during any semester of enrollment during the 2011–2012 and 2012–2013 award years and recalculate Federal Pell Grant awards, as necessary. For each student identified, CSC must provide the following information in a spreadsheet format:

- *student's name,*
- *last four digits of the student's SSN,*
- *award year,*
- *student's EFC,*
- *semester (Fall, Spring, Summer),*
- *number of hours student enrolled in and for which received Federal Pell Grant funds,*
- *number of hours in which the student began attendance,*
- *amount of Federal Pell Grant Program funds disbursed,*
- *date of disbursement,*
- *recalculated amount of Federal Pell Grant Program funds student should have received based on hours student began attendance in, and*
- *difference between recalculated award and amount disbursed.*

CSC must provide legible copies of the following documents:

- *Student account card,*
- *Academic transcript,*
- *Student's class schedule,*

- Copies of all pertinent enrollment records supporting CSC's determination of the student's enrollment status, and
- Pertinent screen shots from the COD indicating amounts and dates of disbursements and returns.

The spreadsheet discussed above must be compiled in an Excel program spreadsheet and submitted in the following manner:

Student	SSN	Award year	EFEC	Semester	Number of Hours Student Enrolled In	Number of Hours in Which Student Began Attendance	Amount of Federal Pell Grant funds disbursed	Date of Disbursement	Recalculated Title IV, HEA funds that Should Have Been Disbursed	Difference
***	****	2011-12	0	Fall	15	6	2775	09/01/11	1388	1387
***	****	2012-13	0	Spring	12	3	2775	02/05/12	694	7081

Instructions for repayment of any liabilities for the 2011–2012 and 2012–2013 award years will be provided in the FPRD letter. The institution must not repay any funds owed to the Department for these award years until the FPRD is issued.

CSC is reminded that hard copy files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

CSC's Response: Finding 1: Enrollment Status Not Verified Before Disbursement

Failure to Pay Pell Eligible Students

Revised Policy: Culver-Stockton will determine Pell eligibility for student's less-than-half-time that file a FAFSA. COA will be based on student's FAFSA status (dependent or independent) and housing status will be considered to be off campus. The two standard budgets of dependent with parent and independent off campus will be used. The COA component will be as follows (it will not include room/board or loan fees):

Tuition: Actual charge

Books: 25% of full-time COA

Personal/transportation: 100% of full-time COA

Actual class fees (if any)

Inconsistent Recalculation of Federal Pell Grant Awards

Culver-Stockton College will appropriately recalculate Pell Grant funds in a timely manner when it is determined that a student's enrollment status has changed.

Attendance

Course Regulations Regarding Class Attendance, Taking Attendance, Administrative Drop

Traditional Campus Revised Policies and Procedures: Students are expected to attend classes regularly. Classroom attendance is often one of the most necessary and important

means of learning and, in many classes, is essential to the educational objectives of the course.

Culver-Stockton is not required to take attendance. However, an appropriate attendance mechanism is in place to verify that a student has started each class, and has attended class as of census date.

At the end of the drop/add period (five class days after classes begin in the 12 week session each semester and two class days after classes begin in the 3 week session each semester), faculty will report to the Registrar any student that has not attended class sessions. If a student has not attended any class sessions by that date and has not communicated the reason for their absence with a college administrator or instructor(s), the student will be administratively dropped from said class(es).

(**Note: During the 2011-12 and 2012-13 school years the policy was 10 days after classes began in the 12-week session.)

If the student is delinquent in attending ALL classes during the drop/add period, the student will be considered a complete administrative drop from all classes. All charges will be removed (unless the student has utilized a book voucher) and financial aid will also be removed.

If the student is delinquent in attending only selected classes during the drop/add period, those classes will be administratively dropped. Applicable adjustments will be made to tuition charges, financial aid and course fees if warranted.

When final grades are submitted, any student who does not have a grade of A, B, C or D will be reviewed within 30 days after the end of the final period of enrollment.

Online Campus Revised Policies and Procedures: Faculty or adjunct faculty teaching in the Online Campus Programs must report any student who has NOT shown evidence of participation by the end of the first week (seven days after classes begin) to the Director of Online Campus. A student who logs into a class, but does not actively participate in course requirements has not met the definition of attendance. Student "attendance" in online courses will be defined as active participation in the course as described in the individual course syllabus. Students who have not communicated the reason for the absences with a college administrator or instructor(s) will be administratively dropped from the class(es).

If the student is delinquent in attending only selected classes during the drop/add period, those classes will be administratively dropped. Applicable adjustments will be made to tuition charges, financial aid and course fees if warranted.

When final grades are submitted, any student who does not have a grade of A, B, C or D will be reviewed within 30 days after the end of the final period of enrollment.

Dropping and Adding Classes, Attendance and Grade Assignment

Traditional Campus: Dropping or adding classes after classes begin requires approval of the student's academic advisor. The drop/add period is during the first five class days in the 12-week session and during the first two class days in the 3-week session. In the case of adding a class after the class begins, the student is responsible for all assignments made prior to enrollment.

If a student drops a class during the drop/add period, the class is removed from the student's academic record. If a student drops a class after the drop/add period but before the published last drop date on the academic calendar, a final grade of W (withdrawn) is assigned to the class. Applicable adjustments are made to tuition charges, financial aid and course fees only during the drop/add period. If a student drops a class after the published last drop date, the final grade is an 'F'.

Change of registration forms to drop or add classes are available in the Registrar's Office or from academic advisors. The change of registration form must be processed in the Registrar's Office.

Under extenuating circumstances, a student may appeal to the Academic Standards Committee to drop a class(es) after the last drop date. The student is expected to provide documentation of the extenuating circumstances. Appeal forms are available in the Registrar's Office.

The grade of "FA" will be used for a student that failed because they stopped attending the class (not because they exceeded the absence policy for an individual faculty member). The academic record will reflect an F.

Online Campus: Dropping or adding classes after classes begin requires approval of the Director of Online Campus. The drop/add period is seven days (to coincide with the Regis Policy) for each 8-week term within the 16-week period of enrollment. In the case of adding a class after the class begins, the student is responsible for all assignments made prior to enrollment.

If a student drops a class during the drop/add period, the class is removed from the student's academic record. If a student drops a class after the drop/add period but before the published last drop date on the academic calendar, a final grade of W (withdrawn) is assigned to the class. Applicable adjustments are made to tuition charges, financial aid and course fees only during the drop/add period. If a student drops a class after the published last drop date, the final grade is an 'F'.

Change of registration forms to drop or add classes are available from the Director of Online Campus, and will be processed in that office.

Official Withdrawal

Traditional Campus: A student who requests a total withdrawal from school on or before the published last day of classes in the 12-week session will be dropped from all classes, and a final grade of W (withdrawn) will be assigned in each class. Students must initiate the official

withdrawal in the Registrar's Office by completing the required withdrawal form, or by contacting other designated college officials orally or in writing. The Registrar determines the official withdrawal date based on the date the student initiates the process. Students that withdraw from all classes are subject to the guidelines in the Withdrawal and Refund Policy in the Financial Information section of the catalog.

Online Campus: A student who requests a total withdrawal from school on or before the published last day of classes in the 16-week session will be dropped from all classes, and a final grade of W (withdrawn) will be assigned in each class. Students must initiate the official withdrawal with the Director of Online Campus by contacting the director in writing. The Director determines the official withdrawal date based on the date the student initiates the process. Students that withdraw from all classes are subject to the guidelines in the Withdrawal and Refund Policy in the Financial Information section of the catalog.

Procedure for Traditional and Online Campus: All of this information will be reported from the Registrar's office to the Financial Aid office in an email in a timely manner once it has been determined that an adjustment must be made to the student's record.

The Financial Aid office will perform any or all of the following, relevant as of census date for the term:

- Determine the student's proper enrollment status.
- Adjust aid to reflect proper enrollment status, if necessary, and adjust any over awards of Title IV aid.
- Adjust COA, if necessary.

Final Determination: CSC is liable for repayment of the Federal Pell Grant funds that were incorrectly disbursed to the students identified in the institution's file review. CSC is responsible for returning \$9,919.00 in Federal Pell Grant funds to the Department on behalf of the students referenced in Appendix B.

Additionally, CSC is responsible for the cost of funds associated with the incorrect disbursement of Federal Pell Grant funds. The total cost of funds liability due to the Department is \$213.00 (\$212.96 rounded). The interest charges were computed using the cost of funds for Federal Pell Grants published in the Federal Register by the Department of the Treasury, effective from the date of disbursement to the date of this determination. Detailed information about this cost of funds liability determination may be found in Appendix E.

The disbursement record for each student identified in Appendix B for Federal Pell Grants must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the appendix.

Adjustments in COD for Federal Pell Grants must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department

receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

COD adjustments are necessary for the closed award year(s) listed above. Before any student level adjustments can be processed, CSC must immediately request extended processing through the COD website (<http://cod.ed.gov>).

1. Under the School menu, choose Request Post Deadline/Extended Processing
2. On the request screen, indicate that the request is based on a program review and provide the Program Review Control Number (PRCN).
3. The institution will be notified of the status of the request at the time of submission, and will also be notified by email when extended processing has been authorized. At that time, the institution must transmit student/borrower level adjustments to COD for the closed award year.

A copy of the adjustment to each student's COD record for Federal Pell Grants must be sent to Mr. Jim Wyant within 45 days of the date of this letter.

Finding 2. Incorrect Return of Title IV Funds Calculations (Return)

Citation: When a recipient of Title IV, HEA program funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must perform a Return calculation to determine the amount of Title IV, HEA program funds the student earned as of the student's withdrawal date. 34 C.F.R. § 668.22.

The Return calculation should incorporate all of the elements identified in pertinent federal regulations. Regulations additionally define "institutional charges" as tuition, fees, room and board (if the student contracts with the institution for the room and board) and other educationally-related expenses assessed by the institution. 34 C.F.R. § 668.22(g)(2).

The percentage of Title IV, HEA program funds earned by the student is equal to the percentage of the payment period completed by the student's withdrawal date if this date occurs on or before the completion of 60 percent of the payment period; or 100 percent if the student's withdrawal date occurs after completion of 60 percent of the payment period. 34 C.F.R. § 668.22(e)(2).

The percentage of unearned Title IV, HEA program funds is the complement of the percentage earned. 34 C.F.R. § 668.22(e)(3).

The amount of Title IV, HEA program funds to be returned is the amount of Title IV, HEA program funds disbursed to the student, as of the date the institution determined the student withdrew, minus the amount of Title IV, HEA program funds earned by the student. 34 C.F.R. § 668.22(e)(4).

The percentage of the payment period completed is determined at an institution where programs are measured in credit hours by dividing the total number of calendar days in the payment

period by the number of calendar days completed in that period as of the student's withdrawal date. 34 C.F.R. § 668.22(f)(1).

The total number of calendar days in a payment period includes all days within the period, except scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in a payment period and the number of days completed in that period. 34 C.F.R. § 668.22(f)(2).

An institution must return as soon as possible the unearned Title IV, IIEA program funds for which it is responsible for returning but no later than 45 days after the institution's determination that the student withdrew. 34 C.F.R. § 668.22(j)(1).

For an institution that is not required to take attendance, an institution must determine the withdrawal date for a student who withdraws without providing notification to the institution no later than 30 days after the end of the earlier of the payment period or period of enrollment, as appropriate, the academic year in which the student withdrew; or the educational program from which the student withdrew. 34 C.F.R. § 668.22(j)(2).

Federal regulations stipulate the institution shall recalculate the student's enrollment status to reflect only those classes for which the student actually began attendance if a student's projected enrollment status changes prior to beginning attendance in all of his or her classes for that payment period. 34 C.F.R. § 690.80(b)(2)(ii).

Any undisbursed Title IV, HEA program funds for the period that the school uses as the basis for the Return calculation is counted as aid that could have been disbursed as long as for a Direct Loan, the institution originated the loan. 2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 5-42.

Noncompliance: *CSC does not have a proper policy in place regarding official and unofficial withdrawals or a procedure for determining if a student has attended each class at least once. A review of CSC's 2011–2012 and 2012–2013 CSC does not have a policy which discusses consequences for official withdrawals, provide guidance regarding what constitutes an unofficial withdrawal or discusses the consequences related to unofficial withdrawals due to nonattendance. CSC does not have a policy that properly identifies institutional charges.*

In three instances, CSC failed to accurately complete a Return calculation:

Student #19: *The Fall 2011 semester began August 22, 2011. Institutional documentation reflects the student officially withdrew August 30, 2011. CSC performed a Return calculation September 14, 2011, and used 108 days as the total number of days in the payment period. Based on school calendars and information provided by the institution, CSC should have used 89 total days in the payment period because the student was not enrolled in the second, three-week session of the semester. Additionally, CSC determined the net amount of aid that could have been disbursed was \$2,985.00 Direct Unsubsidized Loan and \$2,239.00 Direct Subsidized Loan.*

However, the Department's COD system reflects that CSC never originated the Direct Unsubsidized Loan or the Direct Subsidized Loan; thus, the incorrect amount of aid was used in the Return calculation. CSC did not provide a copy of the student's schedule or attendance records to support that the student began attendance in all classes on which the completed Return was based.

This student is also cited in Finding 1, 5, and 12.

Student #41: *The Spring 2013 semester began January 14, 2013. The financial aid file reflects the student officially withdrew March 13, 2013. CSC completed a Return calculation April 2, 2013, and reflected the Title IV, HEA program funds disbursed were: \$2,775.00 Federal Pell Grant, \$1,733.00 Direct Subsidized Loan, and \$990.00 Direct Unsubsidized Loan. However, the student's class schedule indicates the student only attended 11 credit hours that semester, making the student only eligible for a partial Federal Pell Grant disbursement. CSC did not adjustment the student's Federal Pell Grant to reflect the correct amount for which the student was eligible before completing the Return.*

This student is also cited in Findings 1, 8, and 12.

Student #42: *The Fall 2012 semester began August 20, 2012. The financial aid file reflects the student officially withdrew August 21, 2012. There was no documentation provided to reflect that the student began attendance in all classes. In addition, when performing the Return calculation, CSC determined that the net amount that could have been disbursed in the Title IV, HEA program funds was \$1,733.00 of Direct Unsubsidized Loan funds. However, according to the Department's COD system, CSC never originated the loans for the Direct Unsubsidized Loan, thus the incorrect amount of aid was used in the Return calculation.*

In four instances, CSC failed to determine the proper items to be considered as institutional charges:

Students #18: *The student began attendance in the Fall 2011 semester and subsequently withdrew, requiring a Return to be performed. CSC included in the institutional charges for the period a \$50.00 parking fee, which should not have been included as an institutional charge on the Return.*

Student #22: *The student began attendance in the Spring 2012 semester and subsequently withdrew, requiring a Return to be performed. CSC included in the institutional charges for the period \$44.00 in finance charges, which should not have been included as an institutional charge on the Return.*

This student is also cited in Finding 10.

Student #43: *The student began attendance in the Spring 2013 semester and subsequently withdrew, requiring a Return to be performed. CSC included as part of institutional charges for*

the period \$15.00 for a mailbox key replacement and \$30.00 in miscellaneous fees, which should not have been included as institutional charges on the Return.

Student #44: *The student began attendance in the Fall 2012 semester and subsequently withdrew, requiring a Return to be performed. CSC included as part of institutional charges for the period \$80.00 in parking tickets, \$50.00 parking fee, and a \$0.53 finance charge, which should not have been included as institutional charges on the Return.*

Required Action: *A copy of the revised Return calculation policies and procedures must be provided within 30 days of receipt of this report. Upon acceptance of the revised policies and procedures, CSC must apply the revised Return policy to the following required file review. In addition, CSC must provide assurances in its response to this report that CSC will appropriately monitor official and unofficial withdrawals in the future in accordance with applicable Title IV, HEA regulations.*

CSC must provide comprehensive information for all Title IV, HEA recipients who officially or unofficially withdrew during the 2011–2012 and 2012–2013 award years. The institution must identify, review, and report on the files of all Title IV, HEA recipients for whom a Return calculation was performed or should have been performed in each award year. For Return calculations that are found to be improperly calculated and Return calculations that should have been calculated but were not, CSC must perform a correct calculation or recalculation.

For each student identified, CSC must provide the following information:

(0) A spreadsheet that contains, for each Title IV, HEA recipient who officially or unofficially withdrew, the following information:

- () award year;*
- (a) student's last name, first name;*
- (b) student's last four digits of his or her SSN;*
- (c) student's last date of attendance;*
- (d) student's withdrawal date;*
- (e) date CSC determined the student withdrew;*
- (f) date the original Return was calculated;*
 - *amount of Title IV, HEA funds returned, if applicable (organized by Title IV, HEA program);*
 - *date(s) the Return(s) were made (organized by Title IV, HEA program);*
 - *amount of PWD, if applicable;*
 - *Title IV, HEA program from which PWD was made;*
 - *date PWD was paid;*
 - *Adjustment made, per Finding 1;*
 - *date of corrected Return calculation, if applicable;*
 - *corrected amount of Return, if applicable;*
 - *Title IV, HEA program(s) to which corrected Return should be made, if applicable;*
 - *amount of corrected PWD that should be made, if applicable;*

- Title IV, IIEA program from which corrected PWD should be made, if applicable.
- A copy of the complete original Return calculation worksheet for each Title IV, HEA recipient who withdrew in the 2011-2012 and 2012-2013 award years. CSC must identify any calculations that were first performed as a result of the Program Review Report (PRR);
- A copy of the complete corrected Return calculation, if applicable;
- A copy of all pertinent student account cards for the Returns identified above. The account card should reflect the disbursements included in the Return calculation as well as the return of the Title IV, HEA funds, if applicable;
- Legible copies of all audit trail documentation (i.e. wire transfer records on bank statements, institutional drawdown and refund reports, screen prints of COD screens with pertinent detail information, etc.) to support the return of the funds to the Title IV, HEA accounts. The documentation must clearly identify the amount of the Return for the individual in question. If a Return was repaid to the Title IV, HEA programs by check, a legible copy of the cancelled check, front and back, must be submitted;
- A copy of CSC's official withdrawal form (or other official withdrawal documentation) for each Title IV, HEA recipient who officially withdrew, with the official date of withdrawal notated.
- Copies of all pertinent enrollment records supporting CSC's determination of the student's last date of attendance.
- For unearned Title IV, HEA funds required to be returned by a student, copies of all supporting documentation establishing that CSC contacted the student and made appropriate repayment arrangements, as outlined in Federal regulations.

The Return spreadsheets discussed above should be compiled in an Excel program spreadsheet and submitted in CD-ROM format in the following manner:

Award Year	Student's Last Name, First Name	SSN (last four digits)	Last Date of Attendance	Withdrawal Date	Date of Determination
2011-2012	Doe, Jane	1234	01/15/11	01/15/11	06/24/11
2012-2013	Doe, Jill	2345	01/15/12	01/15/12	06/24/12

Date Original Return calculation performed	Amount of Return, if applicable	Title IV, HEA Program	Date Return was Made	Amount of PWD, if applicable	PWD Program
06/25/11	\$2,000	DL Unsub	07/06/11	n/a	n/a
06/25/12	\$1,356	DL Sub	07/06/12	n/a	n/a

Date PWD paid	Date of Corrected Return Calculation, if applicable	Corrected Amount of Return, if applicable	Title IV, HEA program	Amount of corrected PWD, if applicable	PWD program	Adjustment made, per Finding 1
n/a	11/01/12	\$2,000	DL Unsub	n/a	n/a	
n/a	n/a	\$1,356	DL Sub	n/a	n/a	

Instructions for repayment of any liabilities will be provided in the FPRD letter. The institution must not repay any funds owed to the Department until the FPRD is issued.

CSC is reminded that hard copy files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

CSC's Response:

Official and Unofficial Withdrawals and Determining Class Attendance

Course Regulations Regarding Class Attendance, Taking Attendance, Administrative Drop

Traditional Campus Revised Policies and Procedures: Students are expected to attend classes regularly. Classroom attendance is often one of the most necessary and important means of learning and, in many classes, is essential to the educational objectives of the course.

Culver-Stockton is not required to take attendance. However, an appropriate attendance mechanism is in place to verify that a student has started each class, and has attended class as of census date.

At the end of the drop/add period (five class days after classes begin in the 12 week session each semester and two class days after classes begin in the 3 week session each semester), faculty will report to the Registrar any student that has not attended class sessions. If a student has not attended any class sessions by that date and has not communicated the reason for their absence with a college administrator or instructor(s), the student will be administratively dropped from said class(es).

(**Note: During the 2011-12 and 2012-13 school years the policy was 10 days after classes began in the 12-week session.)

If the student is delinquent in attending ALL classes during the drop/add period, the student will be considered a complete administrative drop from all classes. All charges will be removed (unless the student has utilized a book voucher) and financial aid will also be removed.

If the student is delinquent in attending only selected classes during the drop/add period, those classes will be administratively dropped. Applicable adjustments will be made to tuition charges, financial aid and course fees if warranted.

When final grades are submitted, any student who does not have a grade of A, B, C or D will be reviewed within 30 days after the end of the final period of enrollment. Federal financial aid may be returned for students who have not attended past 60% of the semester based on attendance records. Returns will be processed for any students identified and a post withdrawal calculation performed if necessary.

Online Campus Revised Policies and Procedures: Faculty or adjunct faculty teaching in the Online Campus Programs must report any student who has NOT shown evidence of participation by the end of the first week (seven days after classes begin) to the Director of Online Campus. A student who logs into a class, but does not actively participate in course requirements has not met the definition of attendance. Student "attendance" in online courses will be defined as active

participation in the course as described in the individual course syllabus. Students who have not communicated the reason for the absences with a college administrator or instructor(s) will be administratively dropped from the class(es).

If the student is delinquent in attending only selected classes during the drop/add period, those classes will be administratively dropped. Applicable adjustments will be made to tuition charges, financial aid and course fees if warranted.

When final grades are submitted, any student who does not have a grade of A, B, C or D will be reviewed within 30 days after the end of the final period of enrollment.

Dropping and Adding Classes, Attendance and Grade Assignment

Traditional Campus: Dropping or adding classes after classes begin requires approval of the student's academic advisor. The drop/add period is during the first five class days in the 12-week session and during the first two class days in the 3-week session. In the case of adding a class after the class begins, the student is responsible for all assignments made prior to enrollment.

If a student drops a class during the drop/add period, the class is removed from the student's academic record. If a student drops a class after the drop/add period but before the published last drop date on the academic calendar, a final grade of W (withdrawn) is assigned to the class. Applicable adjustments are made to tuition charges, financial aid and course fees only during the drop/add period. If a student drops a class after the published last drop date, the final grade is an 'F'.

Change of registration forms to drop or add classes are available in the Registrar's Office or from academic advisors. The change of registration form must be processed in the Registrar's Office.

Under extenuating circumstances, a student may appeal to the Academic Standards Committee to drop a class(es) after the last drop date. The student is expected to provide documentation of the extenuating circumstances. Appeal forms are available in the Registrar's Office.

Online Campus: Dropping or adding classes after classes begin requires approval of the Director of Online Campus. The drop/add period is seven days (to coincide with the Regis Policy) for each 8-week term within the 16-week period of enrollment. In the case of adding a class after the class begins, the student is responsible for all assignments made prior to enrollment.

If a student drops a class during the drop/add period, the class is removed from the student's academic record. If a student drops a class after the drop/add period but before the published last drop date on the academic calendar, a final grade of W (withdrawn) is assigned to the class. Applicable adjustments are made to tuition charges, financial aid and course fees only during the drop/add period. If a student drops a class after the published last drop date, the final grade is an 'F'.

Change of registration forms to drop or add classes are available from the Director of Online Campus, and will be processed in that office.

Official Withdrawal

Traditional Campus: A student who requests a total withdrawal from school on or before the published last day of classes in the 12-week session will be dropped from all classes, and a final grade of W (withdrawn) will be assigned in each class. Students must initiate the official withdrawal in the Registrar's Office by completing the required withdrawal form, or by contacting other designated college officials orally or in writing. The Registrar determines the official withdrawal date based on the date the student initiates the process. Students that withdraw from all classes are subject to the guidelines in the Withdrawal and Refund Policy in the Financial Information section of the catalog.

Online Campus: A student who requests a total withdrawal from school on or before the published last day of classes in the 16-week session will be dropped from all classes, and a final grade of W (withdrawn) will be assigned in each class. Students must initiate the official withdrawal with the Director of Online Campus by contacting the director in writing. The Director determines the official withdrawal date based on the date the student initiates the process. Students that withdraw from all classes are subject to the guidelines in the Withdrawal and Refund Policy in the Financial Information section of the catalog.

Procedure for Traditional and Online Campus: Traditional and Online Campus: All of this information will be reported from the Registrar's and Online Campus office to the Financial Aid office via email in a timely manner once it has been determined that an adjustment must be made to the student's record.

The Financial Aid office will perform any or all of the following, relevant as of census date for the term:

- Determine the student's proper enrollment status.
- Adjust aid to reflect proper enrollment status, if necessary, and adjust any over awards of Title IV aid.
- Adjust COA, if necessary.

Course Grades

Traditional Campus: Grading at Culver-Stockton College is on a 4.0 scale as follows:

- A=work of outstanding quality; excellent mastery of course work, 4.0 quality points
- B=Good work and achievement of course material, 3.0 quality points
- C=Satisfactory achievement of course material, 2.0 quality points
- D=Deficiency in mastering course material, 1.0 quality points
- F=Failure to meet course requirements, 0.0 quality points

Semester grade point averages and cumulative grade point averages are calculated by dividing the number of quality points earned by the number of credit hours attempted.

At the end of the third week of the 12 week session each semester, faculty will record progress for each student in the categories of participation and work completed by using S for satisfactory or U for unsatisfactory.

Mid-semester and final grades will be recorded by faculty in Jenzabar e-Learning on the appropriate dates as published on the academic calendar.

The grade of "FA" will be used for a student that failed because they stopped attending the class (not because they exceeded the absence policy for an individual faculty member). The academic record will reflect an F.

When final grades are submitted, faculty will be asked to document the last day of attendance for those students who earned an "FA" grade. Federal financial aid may be returned for students who have not attended past 60% of the 15-week semester.

All of this information will be reported from the Registrar's office to the Financial Aid office in an email in a timely manner once it has been determined that an adjustment must be made to the student's record.

Online Campus: Grading at Culver-Stockton College is on a 4.0 scale as follows:

A=work of outstanding quality; excellent mastery of course work, 4.0 quality points

B=Good work and achievement of course material, 3.0 quality points

C=Satisfactory achievement of course material, 2.0 quality points

D=Deficiency in mastering course material, 1.0 quality points

F=Failure to meet course requirements, 0.0 quality points

Semester grade point averages and cumulative grade point averages are calculated by dividing the number of quality points earned by the number of credit hours attempted.

At the end of each week, online instructors are required to log attendance in e-learning using "A" for Absent or "P" for Present. Recording a student as present indicates that the student has actively participated in course work as described in the individual course syllabus.

The grade of "FA" will be used for a student that failed because they stopped attending the class. The academic record will reflect an F.

At the end of each 8-week session, instructors will document the last day of attendance for those students who earned an "FA" grade. Federal financial aid may be returned for students who have not attended past 60% of the 16-week semester.

Traditional and Online Campus: All of this information will be reported from the Registrar's and Online Campus office to the Financial Aid office in an email in a timely manner once it has been determined that an adjustment must be made to the student's record.

The Financial Aid office will perform one of the following, depending on the report from the Registrar's office before performing any withdrawal calculations:

- Determine the student's proper enrollment status.
- Adjust aid to reflect proper enrollment status, if necessary.
- Adjust COA, if necessary.
- Perform withdrawal calculation.

Items to be considered as Institutional Charges

Culver-Stockton will consider institutional charges tuition, campus room/board, unified student fee and class fees (educationally related fees). Books will not be included in the calculation.

Withdrawal Dates and number of Days in Period of Enrollment

Traditional Campus: Culver-Stockton College maintains that withdrawal calculations are based on a 15-week period of enrollment for the traditional semesters.

Online Campus: Culver-Stockton College maintains that withdrawal calculations are based on a 16-week period of enrollment for Online Campus.

Aid that Could Have Been Disbursed

In order to determine that aid can be used on the withdrawal calculation, Culver-Stockton College will first check to see if all Title IV Aid has been originated. If they have been originated, they can be used as aid that could have been disbursed. If they have not been originated, they will not be considered in the withdrawal calculation.

Cross-Registration for Traditional and Online Campus

A Culver-Stockton College traditional on-campus student may need online courses that are not currently offered in an on-campus setting, but are required for graduation. In this instance, the student may cross-register for the courses online through the Online Campus Program. Students enrolled in Traditional Campus who qualify to enroll in an online course pay traditional tuition, and will be eligible for full-time institutional and federal aid. Forms must be submitted and approved in the Registrar's office.

Final Determination: The Department reviewed CSC's response and the applicable documents submitted. Additionally, program reviewers examined the revised procedures implemented by CSC to ensure Return calculations are completed timely and properly in the future.

Based on CSC's response to this finding, the Department has established liabilities for those students identified in the file reconstruction performed by CSC for the 2011-2012 and 2012-2013 award years. The total liabilities established as a result of incorrect returns are **\$3,322.00**. The liabilities are established by program as follows:

- **\$1,774.00 in Federal Pell Grant funds;**
- **\$ 117.00 in Direct Subsidized Stafford Loan funds; and**
- **\$1,431.00 in Direct Unsubsidized Stafford Loan funds**

Student specific liabilities are outlined in Appendix B.

CSC is also responsible for the cost of funds associated with the failure to ensure funds which are required to be returned due to withdrawals. The cost of funds liability due to the Department as a result of the holding of Federal Pell Grant funds is **\$31.00 (\$31.23, rounded)**. The cost of funds liability due to the department as a result of the holding of Federal Direct Loan funds is **\$32.00**. The interest charges were computed using the cost of funds for Federal Pell Grants and Federal Direct Loans published in the Federal Register by the Department of the Treasury, effective from the date of disbursement to the date of this determination. A copy of the results of the cost of funds calculations is included in Appendix E.

CSC must notify all students and/or borrowers in writing regarding payments made on their behalf. This notification must include the amount and date of the payments.

The disbursement record for each student identified in Appendix B for Federal Pell Grants and Federal Direct Loans must be adjusted in the COD system based on the recalculated amount identified in the appendix.

Adjustments in COD for Federal Pell Grants and Federal Direct Loans must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

COD adjustments are necessary for the closed award year(s) listed above. Before any student level adjustments can be processed, CSC must immediately request extended processing through the COD website (<http://cod.ed.gov>).

1. Under the School menu, choose Request Post Deadline/Extended Processing
2. On the request screen, indicate that the request is based on a program review and provide the Program Review Control Number (PRCN).
3. The institution will be notified of the status of the request at the time of submission, and will also be notified by email when extended processing has been authorized. At that time, the institution must transmit student/borrower level adjustments to COD for the closed award year.

A copy of the adjustment to each student's COD record for Federal Pell Grants must be sent to Mr. Jim Wyant within 45 days of the date of this letter.

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the Final Program Review Determination is as follows. The liability amount reflects **unduplicated** liabilities because no student appears in more than one finding. This information is provided so that the institution understands the liabilities associated with each finding. The payment instructions in Section E reflect unduplicated liabilities.

Liabilities	Pell (Closed Award Year)	DI/FFEL
Finding 1	\$9,919.00	\$0
Finding 2	\$1,774.00	\$1,548.00
Subtotal 1	\$11,693.00	\$1,548.00
Interest/Finding 1	\$213.00	\$0.00
Interest/Finding 2	\$31.00	\$32.00
ACA	\$0.00	\$0.00
Subtotal 2	\$244.00	\$0.00
TOTAL	11,937.00	\$1,580.00
Payable To:		
Department	11,937.00	\$1,580.00
COD Adjustments	\$11,693.00	\$1,548.00

E. Payment Instruction

1. Liabilities Owed to the Department

Liabilities Owed to the Department \$1,000 or More but Less Than \$100,000

CSC owes to the Department **\$13,517.00**. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount: **\$13,517.00**
DUNS: **075904953**
TIN: **430610813**
Program Review Control Number: **201330728274**

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. CSC is also responsible for repaying any interest that accrues. If CSC has any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to CSC's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Department's Accounts Receivable Group at the address below to apply for a payment plan. Interest charges and other conditions apply.

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, CSC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due CSC from the Federal Government. **CSC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, CSC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

2. Liabilities Owed to FFEL Lenders and the Department in the case of Direct Loans

William D. Ford Federal Direct Loan (Direct Loan) Liabilities:

Direct Loan Closed Award Years (Request Extended Processing)

Finding: 2

Appendices: B and C

CSC must repay the following Direct Loan liabilities:

List each program by principal, interest, and award year on separate rows

Direct Loan Closed Award Year		
Amount (Principal)	Amount (Interest)	Award Year
\$1,548.00	\$32.00	2011-2012
Total Principal	Total Interest	
\$1,548.00	\$32.00	

This amount is reflected in the total amount owed to the Department in Section 1 above.

The disbursement record for each student identified in the appendix to the applicable finding must be adjusted in the COD system based on the recalculated amount identified in the appendix.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

A copy of the adjustment to each student's COD record must be sent to Mr. Jim Wyant **within 45 days of the date of this letter.**

Request Extended Processing

COD adjustments are necessary for the closed award year(s) listed above. Before any student level adjustments can be processed, CSC must immediately request extended processing through the COD Website (<http://cod.ed.gov>).

- Click on the Request Post Deadline/Extended Processing link under the School menu.
- On the request screen, the institution should indicate in their explanation that the request is based on a program review, and provide the program review control number.

- The institution will be notified of the status of the request at the time of submission, and will also be notified by email to the FAA and President when extended processing has been authorized. At that time, the school must transmit student/borrower level adjustments to COD for the closed award year(s)

3. Liabilities Owed to the Department in the case of Title IV, HEA Grants

Federal Pell Grant – Closed Award Year

Findings: 1 and 2

Appendices: B and E

CSC must repay:

Federal Pell Grant -- Closed Award Year			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$9,919.00	\$212.96	Federal Pell Grant	2011-2012
\$1,774.00	\$ 31.13	Federal Pell Grant	2012-2013
Total Principal	Total Interest		
\$11,693.00	\$244.09		

This amount is reflected in the total amount owed to the Department in Section 1 above.

The disbursement record for each student identified in the appendix to the applicable finding must be adjusted in the COD system based on the recalculated amount identified in the appendix.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

A copy of the adjustment to each student's COD record must be sent to Mr. Jim Wyant **within 45 days of the date of this letter.**

Request Extended Processing

COD adjustments are necessary for the closed award year(s) listed above. Before any student level adjustments can be processed, CSC must immediately request extended processing through the COD Website (<http://cod.cd.gov>).

- Click on the Request Post Deadline/Extended Processing link under the School menu.

- On the request screen, the institution should indicate in their explanation that the request is based on a program review, and provide the program review control number.
- The institution will be notified of the status of the request at the time of submission, and will also be notified by email to the FAA and President when extended processing has been authorized. At that time, the school must transmit student/borrower level adjustments to COD for the closed award year(s)

Final Program Review Determination
PRCN: 201330728274

Appendix C
Program Review Report

Culver-Stockton College

OPE ID: 00246000

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PRCN: 201330728274

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Division-Kansas City

Program Review Report

May 6, 2014

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A. Institutional Information

Culver-Stockton College
One College Hill
Canton / MO / 63435 - 1299

Type: Private nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: North Central Association of Colleges and Schools

Current Student Enrollment: 752

% of Students Receiving Title IV: 86% (2011-2012)

Title IV Participation: (Source G5)

2011-2012 Award Year	
Federal Pell Grant	\$1,603,754.00
Federal Supplemental Education Opportunity Grant	\$ 122,328.00
Federal Work-Study	\$ 82,247.00
Federal Direct Subsidized Loan	\$2,108,915.00
Federal Direct Unsubsidized Loan	\$2,268,520.00

Default Rate FFEL/DL:	2010: 7.2%
	2009: 7.1%
	2008: 6.1%

Default Rate Perkins:	06/30/2012: 36.6%
	06/30/2011: 27.5%
	06/30/2010: 21.9%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Culver-Stockton College (CSC) from May 13, 2013 to May 17, 2013. The review was conducted by Jim Wyant, Rhonda Puffer, and Angela Beam.

The focus of the review was to determine CSC's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV, HEA programs. The review consisted of, but was not limited to, an examination of CSC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011–2012 and 2012–2013 (year to date) award years. An additional, 7 files from 2011-2012 and 8 files from 2012-2013 were selected to adequately review administration of FWS, FSEOG, Federal Perkins Loans, and Returns. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers (SNN) of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning CSC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve CSC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination (FPRD) letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by CSC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Enrollment Status Not Verified Before Disbursement

Citation: If the student's enrollment status changes from one academic term to another term within the same award year, the institution shall recalculate the Federal Pell Grant award for the new payment period taking into account any changes in the cost of attendance. If the student's projected enrollment status changes during a payment period after the student has begun attendance in all of his or her classes for that payment period, the institution may establish a policy under which the student's award for the payment period is recalculated. Any such recalculations must take into account any changes in the cost of attendance. If such a policy is established, it must apply to all students. If a student's projected enrollment status changes during a payment period before the student begins attendance in all of his or her classes for that payment period, the institution shall recalculate the student's enrollment status to reflect only those classes for which the student actually began attendance. *34 C.F.R. § 690.80(b)*.

Noncompliance: CSC failed to recalculate Federal Pell Grant awards if a student did not begin attendance in all of his or her courses. CSC did not have a mechanism in place to verify enrollment until the end of the term

During the review, program reviewers identified three students who received Federal Pell Grant Program funds in excess of the enrollment status established on the student's academic transcript. CSC was unable to provide documentation that reflected the students began attendance in one or more courses before withdrawing.

Student #19: The student enrolled in 12 hours for the Fall 2011 semester which spanned from August 22, 2011 to November 18, 2011. The student received a Federal Pell Grant award based on a full time enrollment status in the amount of \$2,775.00. The student withdrew from all classes August 30, 2011; however, there was no documentation that reflected the student began attendance in one or more courses before withdrawing.

This student is also cited in Findings 2, 5, and 12.

Student #28: The student enrolled in 15 hours for the Spring 2013 semester, which spanned from January 14, 2013 to May 18, 2013. CSC awarded the student with a Federal Pell Grant award of \$1,750.00, based on full-time enrollment and a 2039 EFC. The student's academic transcript reflects a "F" grade for 11 hours in which he was enrolled during the 12-week session in the Spring 2013 semester which spanned from January 14, 2013 until April 19, 2013, and a "W" for 4 hours the student was scheduled to attend in the subsequent 3-week session in the

Spring 2013 semester which spanned from April 24, 2013 until May 18, 2013. Based on the "Final Grade of 'F' in Classes Due to Non Attendance" report for the student that CSC provided after the review, the student's last documented date of attendance was March 20, 2013, and only began attendance in 10 of the 15 scheduled credit hours. The student was only eligible to receive a three-quarter time Federal Pell Grant disbursement of \$1,313.00; thus the student received ineligible Federal Pell Grant funds in the amount of \$437.00.

Student #41: The student enrolled in 14 hours for the Spring 2013 semester, which spanned from January 14, 2013 to May 18, 2013. The student received \$2775.00 in Federal Pell Grant funds. The academic transcript reflects 11 hour in which he was enrolled during the 12-week session in the Spring 2013 semester which spanned from January 14, 2013 until April 19, 2013, and the student's schedule shows 3 hours of enrollment in the subsequent 3-week session in the Spring 2013 semester which spanned from April 24, 2013 until May 18, 2013. The student officially withdrew March 13, 2013, and only began attendance in 11 of 14 scheduled hours. Based on the change in enrollment status, the student was only eligible to receive a three-quarter time Federal Pell Grant disbursement of \$2,081.00; thus, the student received ineligible Federal Pell Grant funds in the amount of \$694.00.

This student is also cited in Findings 2, 8, and 12.

Failure to Pay Pell Eligible Students

CSC did not follow the Title IV, HEA regulatory requirements associated with the administration of Federal Pell Grant Program funds resulting in the institution's failure to pay all eligible students. On a systemic basis, CSC did not award or disburse Federal Pell Grant Program funds to students with an enrollment status of less-than-half-time.

Inconsistent Recalculation of Federal Pell Grant Awards

CSC was adjusting Federal Pell Grant awards during the semester for the two eight-week courses; however, CSC was not adjusting Federal Pell Grant awards for other schedule changes after the add/drop period. If an institution establishes a date after which a Federal Pell Grant is no longer recalculated, this date must be applied consistently to all students.

Required Action: CSC must develop internal policies and procedures that require faculty members to report students who fail to begin attendance in a course to the Financial Aid Office in an accurate and timely manner. These procedures must outline the institution's procedures for resolving conflicting information and for documenting a student's last date of attendance, as well as for adjusting Title IV, HEA program disbursements within regulatory deadlines. Additionally, CSC must review and revise its internal policy and procedures to ensure that Federal Pell Grant funds are re-calculated in a timely manner in the future and that CSC appropriately awards and disburses Federal Pell Grant funds to all eligible students. A copy of these procedures must accompany CSC's response to this report.

In addition, CSC must review the enrollment records of all Federal Pell Grant recipients during the 2011–2012 and 2012–2013 award years and who failed to earn a passing grade in one or more courses (grades of W, I, FN, F, etc.) or failed to attend a course during any semester of enrollment during the 2011–2012 and 2012–2013 award years and recalculate Federal Pell Grant awards, as necessary. For each student identified, CSC must provide the following information in a spreadsheet format:

- student's name,
- last four digits of the student's SSN,
- award year,
- student's EFC,
- semester (Fall, Spring, Summer),
- number of hours student enrolled in and for which received Federal Pell Grant funds,
- number of hours in which the student began attendance,
- amount of Federal Pell Grant Program funds disbursed,
- date of disbursement,
- recalculated amount of Federal Pell Grant Program funds student should have received based on hours student began attendance in, and
- difference between recalculated award and amount disbursed.

CSC must provide legible copies of the following documents:

- Student account card,
- Academic transcript,
- Student's class schedule,
- Copies of all pertinent enrollment records supporting CSC's determination of the student's enrollment status, and
- Pertinent screen shots from the COD indicating amounts and dates of disbursements and returns.

The spreadsheet discussed above must be compiled in an Excel program spreadsheet and submitted in the following manner:

Student	SSN	Award year	EFC	Semester	Number of Hours Student Enrolled In	Number of Hours in Which Student Began Attendance	Amount of Federal Pell Grant funds disbursed	Date of Disbursement	Recalculated Title IV HEA funds that Should Have Been Disbursed	Difference
***	****	2011-12	0	Fall	15	6	2775	09/01/11	1388	1387
***	****	2012-13	0	Spring	12	3	2775	02/05/12	694	2081

Instructions for repayment of any liabilities for the 2011–2012 and 2012–2013 award years will be provided in the FPRD letter. The institution must not repay any funds owed to the Department for these award years until the FPRD is issued.

CSC is reminded that hard copy files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

Finding 2. Incorrect Return of Title IV Funds Calculations (Return)

Citation: When a recipient of Title IV, HEA program funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must perform a Return calculation to determine the amount of Title IV, HEA program funds the student earned as of the student's withdrawal date.
34 C.F.R. § 668.22.

The Return calculation should incorporate all of the elements identified in pertinent federal regulations. Regulations additionally define "institutional charges" as tuition, fees, room and board (if the student contracts with the institution for the room and board) and other educationally-related expenses assessed by the institution. *34 C.F.R. § 668.22(g)(2).*

The percentage of Title IV, HEA program funds earned by the student is equal to the percentage of the payment period completed by the student's withdrawal date if this date occurs on or before the completion of 60 percent of the payment period; or 100 percent if the student's withdrawal date occurs after completion of 60 percent of the payment period. *34 C.F.R. § 668.22(e)(2).*

The percentage of unearned Title IV, HEA program funds is the complement of the percentage earned. *34 C.F.R. § 668.22(e)(3).*

The amount of Title IV, HEA program funds to be returned is the amount of Title IV, HEA program funds disbursed to the student, as of the date the institution determined the student withdrew, minus the amount of Title IV, HEA program funds earned by the student.
34 C.F.R. § 668.22(e)(4).

The percentage of the payment period completed is determined at an institution where programs are measured in credit hours by dividing the total number of calendar days in the payment period by the number of calendar days completed in that period as of the student's withdrawal date.
34 C.F.R. § 668.22(f)(1).

The total number of calendar days in a payment period includes all days within the period, except scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in a payment period and the number of days completed in that period.
34 C.F.R. § 668.22(f)(2).

An institution must return as soon as possible the unearned Title IV, HEA program funds for which it is responsible for returning but no later than 45 days after the institution's determination that the student withdrew. *34 C.F.R. § 668.22(j)(1).*

For an institution that is not required to take attendance, an institution must determine the withdrawal date for a student who withdraws without providing notification to the institution no later than 30 days after the end of the earlier of the payment period or period of enrollment, as appropriate, the academic year in which the student withdrew; or the educational program from which the student withdrew. *34 C.F.R. § 668.22(j)(2)*.

Federal regulations stipulate the institution shall recalculate the student's enrollment status to reflect only those classes for which the student actually began attendance if a student's projected enrollment status changes prior to beginning attendance in all of his or her classes for that payment period. *34 C.F.R. § 690.80(b)(2)(ii)*.

Any undisbursed Title IV, HEA program funds for the period that the school uses as the basis for the Return calculation is counted as aid that could have been disbursed as long as for a Direct Loan, the institution originated the loan. *2011-2012 & 2012-2013 Federal Student Aid Handbook, Volume 5-42*.

Noncompliance: CSC does not have a proper policy in place regarding official and unofficial withdrawals or a procedure for determining if a student has attended each class at least once. A review of CSC's 2011–2012 and 2012–2013 CSC does not have a policy which discusses consequences for official withdrawals, provide guidance regarding what constitutes an unofficial withdrawal or discusses the consequences related to unofficial withdrawals due to nonattendance. CSC does not have a policy that properly identifies institutional charges.

In three instances, CSC failed to accurately complete a Return calculation:

Student #19: The Fall 2011 semester began August 22, 2011. Institutional documentation reflects the student officially withdrew August 30, 2011. CSC performed a Return calculation September 14, 2011, and used 108 days as the total number of days in the payment period. Based on school calendars and information provided by the institution, CSC should have used 89 total days in the payment period because the student was not enrolled in the second, three-week session of the semester. Additionally, CSC determined the net amount of aid that could have been disbursed was \$2,985.00 Direct Unsubsidized Loan and \$2,239.00 Direct Subsidized Loan. However, the Department's COD system reflects that CSC never originated the Direct Unsubsidized Loan or the Direct Subsidized Loan; thus, the incorrect amount of aid was used in the Return calculation. CSC did not provide a copy of the student's schedule or attendance records to support that the student began attendance in all classes on which the completed Return was based.

This student is also cited in Finding 1, 5, and 12.

Student #41: The Spring 2013 semester began January 14, 2013. The financial aid file reflects the student officially withdrew March 13, 2013. CSC completed a Return calculation April 2, 2013, and reflected the Title IV, HEA program funds disbursed were: \$2,775.00 Federal Pell Grant, \$1,733.00 Direct Subsidized Loan, and \$990.00 Direct Unsubsidized Loan. However, the student's class schedule indicates the student only attended 11 credit hours that semester, making

the student only eligible for a partial Federal Pell Grant disbursement. CSC did not adjustment the student's Federal Pell Grant to reflect the correct amount for which the student was eligible before completing the Return.

This student is also cited in Findings 1, 8, and 12.

Student #42: The Fall 2012 semester began August 20, 2012. The financial aid file reflects the student officially withdrew August 21, 2012. There was no documentation provided to reflect that the student began attendance in all classes. In addition, when performing the Return calculation, CSC determined that the net amount that could have been disbursed in the Title IV, HEA program funds was \$1,733.00 of Direct Unsubsidized Loan funds. However, according to the Department's COD system, CSC never originated the loans for the Direct Unsubsidized Loan, thus the incorrect amount of aid was used in the Return calculation.

In four instances, CSC failed to determine the proper items to be considered as institutional charges:

Students #18: The student began attendance in the Fall 2011 semester and subsequently withdrew, requiring a Return to be performed. CSC included in the institutional charges for the period a \$50.00 parking fee, which should not have been included as an institutional charge on the Return.

Student #22: The student began attendance in the Spring 2012 semester and subsequently withdrew, requiring a Return to be performed. CSC included in the institutional charges for the period \$44.00 in finance charges, which should not have been included as an institutional charge on the Return.

This student is also cited in Finding 10.

Student #43: The student began attendance in the Spring 2013 semester and subsequently withdrew, requiring a Return to be performed. CSC included as part of institutional charges for the period \$15.00 for a mailbox key replacement and \$30.00 in miscellaneous fees, which should not have been included as institutional charges on the Return.

Student #44: The student began attendance in the Fall 2012 semester and subsequently withdrew, requiring a Return to be performed. CSC included as part of institutional charges for the period \$80.00 in parking tickets, \$50.00 parking fee, and a \$0.53 finance charge, which should not have been included as institutional charges on the Return.

Required Action: A copy of the revised Return calculation policies and procedures must be provided within 30 days of receipt of this report. Upon acceptance of the revised policies and procedures, CSC must apply the revised Return policy to the following required file review. In addition, CSC must provide assurances in its response to this report that CSC will appropriately monitor official and unofficial withdrawals in the future in accordance with applicable Title IV, HEA regulations.

CSC must provide comprehensive information for all Title IV, HEA recipients who officially or unofficially withdrew during the 2011–2012 and 2012–2013 award years. The institution must identify, review, and report on the files of all Title IV, HEA recipients for whom a Return calculation was performed or should have been performed in each award year. For Return calculations that are found to be improperly calculated and Return calculations that should have been calculated but were not, CSC must perform a correct calculation or recalculation.

For each student identified, CSC must provide the following information:

- (0) A spreadsheet that contains, for each Title IV, HEA recipient who officially or unofficially withdrew, the following information:
 - () award year;
 - (a) student's last name, first name;
 - (b) student's last four digits of his or her SSN;
 - (c) student's last date of attendance;
 - (d) student's withdrawal date;
 - (e) date CSC determined the student withdrew;
 - (f) date the original Return was calculated;
 - amount of Title IV, HEA funds returned, if applicable (organized by Title IV, HEA program);
 - date(s) the Return(s) were made (organized by Title IV, HEA program);
 - amount of PWD, if applicable;
 - Title IV, HEA program from which PWD was made;
 - date PWD was paid;
 - Adjustment made, per Finding 1;
 - date of corrected Return calculation, if applicable;
 - corrected amount of Return, if applicable;
 - Title IV, HEA program(s) to which corrected Return should be made, if applicable;
 - amount of corrected PWD that should be made, if applicable;
 - Title IV, HEA program from which corrected PWD should be made, if applicable.
- A copy of the complete original Return calculation worksheet for each Title IV, HEA recipient who withdrew in the 2011–2012 and 2012–2013 award years. CSC must identify any calculations that were first performed as a result of the Program Review Report (PRR);
- A copy of the complete corrected Return calculation, if applicable;
- A copy of all pertinent student account cards for the Returns identified above. The account card should reflect the disbursements included in the Return calculation as well as the return of the Title IV, HEA funds, if applicable;
- Legible copies of all audit trail documentation (i.e. wire transfer records on bank statements, institutional drawdown and refund reports, screen prints of COD screens with pertinent detail information, etc.) to support the return of the funds to the Title IV, HEA accounts. The documentation must clearly identify the amount of the Return for the individual in question. If a Return was repaid to the Title IV, HEA programs by check, a legible copy of the cancelled check, front and back, must be submitted;

- A copy of CSC's official withdrawal form (or other official withdrawal documentation) for each Title IV, HEA recipient who officially withdrew, with the official date of withdrawal notated.
- Copies of all pertinent enrollment records supporting CSC's determination of the student's last date of attendance.
- For unearned Title IV, HEA funds required to be returned by a student, copies of all supporting documentation establishing that CSC contacted the student and made appropriate repayment arrangements, as outlined in Federal regulations.

The Return spreadsheets discussed above should be compiled in an Excel program spreadsheet and submitted in CD-ROM format in the following manner:

Award Year	Student's Last Name, First Name	SSN (last four digits)	Last Date of Attendance	Withdrawal Date	Date of Determination
2011-2012	Doe, Jane	1234	01/15/11	01/15/11	06/24/11
2012-2013	Doe, Jill	2345	01/15/12	01/15/12	06/24/12

Date Original Return calculation performed	Amount of Return, if applicable	Title IV, HEA Program	Date Return was Made	Amount of PWD, if applicable	PWD Program
06/25/11	\$2,000	DL Unsub	07/06/11	n/a	n/a
06/25/12	\$1,356	DL Sub	07/06/12	n/a	n/a

Date PWD paid	Date of Corrected Return Calculation, if applicable	Corrected Amount of Return, if applicable	Title IV, HEA program	Amount of corrected PWD, if applicable	PWD program	Adjustment made, per Finding 1
n/a	11/01/12	\$2,000	DL Unsub	n/a	n/a	
n/a	n/a	\$1,356	DL Sub	n/a	n/a	

Instructions for repayment of any liabilities will be provided in the FPRD letter. The institution must not repay any funds owed to the Department until the FPRD is issued.

CSC is reminded that hard copy files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

Finding 3. Failure to Obtain Authorization for Post Withdrawal Disbursement (PWD) Due After Return

Citation: If, as a result of a Return, the total amount of Title IV, HEA program funds that the student earned is greater than the total amount of Title IV, HEA program funds that was disbursed to the student or on behalf of the student in the case of a PLUS loan, as of the date of the institution's determination that the student withdrew, the difference between these amounts must be treated as a PWD. 34 C.F.R. §§ 668.22(a)(5).

A PWD must be made from available grant funds before available loan funds. If outstanding charges exist on the student's account, the institution may credit the student's account up to the amount of outstanding charges with all or a portion of any grant funds that make up the PWD

and loan funds that make up the PWD only after obtaining confirmation from the student or parent, in the case of a parent PLUS loan, that they still wish to have the loan funds disbursed. The institution must disburse directly to a student any amount of a PWD of grant funds that is not credited to the student's account. The institution must make the disbursement as soon as possible, but no later than 45 days after the date of the institution's determination that the student withdrew. The institution must offer to disburse directly to a student, or parent, in the case of a parent PLUS loan, any amount of a PWD of loan funds that is not credited to the student's account. The institution must make a direct disbursement of any loan funds that make up the PWD only after obtaining the student's, or parent's in the case of a parent PLUS loan, confirmation that the student or parent still wishes to have the loan funds disbursed. An institution must document in the student's file the result of any notification made of the student's right to cancel all or a portion of loan funds or of the student's right to accept or decline loan funds, and the final determination made concerning the disbursement. *34 C.F.R. § 668.22(a)(6)*.

Noncompliance: CSC failed to obtain a student's authorization to credit the student's account with the PWD credited to the student's account.

Student #21: The student officially withdrew January 30, 2012, from the Spring 2012 semester, which began January 9, 2012. CSC performed a Return calculation February 2, 2012, which resulted in the student being eligible for a PWD of \$537.00 in Direct Unsubsidized Loan funds. CSC disbursed \$537.00 to the student's account without obtaining the student's authorization allowing for the PWD.

Required Action: Finding 3 requires CSC to review the files of all Title IV, HEA recipients who officially or unofficially withdrew during the 2011–2012 and 2012–2013 award years and report on any Return calculations found to have been paid late, not paid, improperly paid, improperly calculated, or not calculated. Consequently, no additional corrective action will be required as a result of this finding at this time.

Finding 4. Incorrect Verification

Citation: For each award year, the Secretary publishes in the Federal Register notice the FAFSA information that an institution and an applicant may be required to verify. For each applicant whose FAFSA information is selected for verification by the Secretary, the Secretary specifies the specific information that the applicant must verify. *34 C.F.R. § 668.56*.

In addition to the Federal Register notice, *34 C.F.R. § 668.57* identifies acceptable documentation if the applicant's FAFSA information is selected for verification.

Noncompliance: For the students outlined below, CSC failed to complete the requirements of the Department's verification process and/or resolve instances of conflicting information:

Student #4: The student was selected for verification and was disbursed Title IV, HEA program funds based on Transaction 03 (547 EFC) of the student's 2011–2012 ISIR. CSC did not collect any supporting documentation or verification paperwork that was necessary to verify the five required data elements for the 2011–2012 award year.

This student is also cited in Finding 11.

Student #36: The student was selected for verification and was disbursed Title IV, HEA funds based on completed verification of Transaction 02 (0 EFC) of the student's 2012–2013 ISIR. A review of the student's ISIR reflects that the student's income earned from work was \$559.00. On the 2012-2013 Dependent Verification Worksheet, section C, the student did not list an amount or provide copies of his W-2 to confirm the amount listed on the ISIR was correct. Additionally, the student's mother's 2011 IRS Tax Transcript was not collected.

Required Action: CSC must resolve the verification deficiencies by obtaining the required documentation and making any necessary adjustments. If CSC is unable to properly complete the verification process for any or all the students, the institution may be held liable for all Title IV, HEA funds disbursed to those students in the relevant award years.

In addition, CSC must revise and implement policy and procedures that will ensure that, in the future, the verification process is properly completed for all students. A copy of the policy and procedures must accompany CSC's response to this finding.

Instructions for repayment of any liabilities will be provided in the FPRD letter. The institution must not repay any funds owed to the Department until the FPRD is issued.

CSC is reminded that hard copy files containing PII must be safeguarded as described in the enclosure to the cover letter of this report.

Finding 5. Inadequate/Inaccurate Cost of Attendance (COA) Budgets

Citation: The amount of need of any student for financial assistance is equal to the COA minus the expected family contribution (EFC) for such student, minus estimated financial assistance not received under the Title IV. *Higher Education Act of 1965, as amended, Sec.471.*

For the purpose of determining Title IV, HEA assistance, the term "COA" means:

- tuition and fees normally assessed a student carrying the same academic workload as determined by the institution, and including costs for rental or purchase of any equipment, materials, or supplies required of all students in the same course of study;

- an allowance for books, supplies, transportation, and miscellaneous personal expenses, including a reasonable allowance for the documented rental or purchase of a personal computer, for a student attending the institution on at least a half-time basis, as determined by the institution;
- an allowance (as determined by the institution) for room and board costs incurred by the student which—
 - shall be an allowance determined by the institution for a student without dependents residing at home with parents;
 - for students without dependents residing in institutionally owned or operated housing, shall be a standard allowance determined by the institution based on the amount normally assessed most of its residents for room and board; and
 - for all other students shall be an allowance based on the expenses reasonably incurred by such students for room and board;
- for less-than-half-time students (as determined by the institution) tuition and fees and an allowance for only books, supplies, and transportation (as determined by the institution) and dependent care expenses;
- for a student engaged in a program of study by correspondence, only tuition and fees and, if required, books and supplies, travel, and room and board costs incurred specifically in fulfilling a required period of residential training;
- for incarcerated students only tuition and fees and, if required, books and supplies;
- for a student enrolled in an academic program in a program of study abroad approved for credit by the student's home institution, reasonable costs associated with such study (as determined by the institution at which such student is enrolled);
- for a student with one or more dependents, an allowance based on the estimated actual expenses incurred for such dependent care, based on the number and age of such dependents;
- for a student with a disability, an allowance (as determined by the institution) for those expenses related to the student's disability, including special services, personal assistance, transportation, equipment, and supplies that are reasonably incurred and not provided for by other assisting agencies;
- for a student receiving all or part of the student's instruction by means of telecommunications technology, no distinction shall be made with respect to the mode of instruction in determining costs;
- for a student engaged in a work experience under a cooperative education program, an allowance for reasonable costs associated with such employment (as determined by the institution); and
- for a student who receives a loan under this or any other Federal law, or, at the option of the institution, a conventional student loan incurred by the student to cover a student's cost of attendance at the institution, an allowance for the actual cost of any loan fee, origination fee, or insurance premium charged to such student or such parent on such loan, or the average cost of any such fee or premium charged by the Secretary, lender, or guaranty agency making or insuring such loan. *Higher Education Act of 1965, as amended, Sec. 472.*

Federal regulations state that an institution shall establish and maintain, on a current basis, all documentation relating to its administration of the Title IV programs in accordance with all applicable requirements. *34 C.F.R. § 668.14(a)(4).*

Noncompliance: CSC increases indirect costs yearly by one to three percent; however, CSC was unable to provide documentation demonstrating how it determined the indirect cost increases. Additionally, on a systematic basis, the COA reported to COD for the Federal Pell Grant Program does not match CSC's published COA. CSC confirmed that the system it uses to

transmit data to COD was improperly omitting a particular field, thereby causing COD to reflect an inaccurate COA.

CSC does not adjust the COA for students enrolled less than full-time. Additionally, CSC does not prorate COA when students do not enroll in all 15 weeks of a semester.

The following student was enrolled less than full-time but was assigned a full-time budget, potentially resulting in over-awarding of Title IV, HEA program funds.

Student #19: The student was enrolled in 15 credits in the 12-week session of the Fall 2011 semester. The student was not enrolled in the second, three-week session of the semester; however, CSC still used the same 30 week COA for this student.

This student is also cited in Findings 1, 2, and 9.

Required Action: CSC must develop and submit a copy of its COA policy and procedure as to how it determines, calculates and documents the non-direct cost components for all budgets for students who enroll full time, less than full time and less-than-half-time. CSC must take measures to ensure its system properly transmits to COD accurate COA for students and provide documentation that new procedures are properly reporting to COD.

Additionally, CSC must recalculate the COA for the student listed above and determine if the student was over awarded. Documentation of the outcome for this student must accompany CSC's response to this report.

Finding 6. Inadequate Federal Work Study (FWS) Awarding and Disbursing Procedures

Citation: Before an institution makes an initial disbursement of FWS compensation to a student for an award period, the institution must notify the student of the amount of funds the student is authorized to earn, and how and when the FWS compensation will be paid.

34 C.F.R. § 675.16(a)(3).

As a participant in the FWS program, CSC must establish and maintain fiscal records for each student employed under the FWS program, which includes a certification that each student has worked and earned the wage amount being paid. The student's supervisor, or an official of the institution or off-campus agency, must sign the certification, which must include, for students being paid on an hourly basis, a timesheet showing the hours each student worked and the rate of pay.

34 C.F.R. § 675.19(b)(2)(i).

Noncompliance: CSC determined eligibility and awarded FWS to students to replace institutional wages that had already been earned and paid.

Students #5, #15, #38, and #40: Students were paid institutional funds during the Fall 2012 semester and then reallocated to be FWS funds during the Spring 2013 semester.

During a review of the FWS timesheets, program reviewers determined that CSC failed to accurately reconcile FWS awards and FWS monies paid to the student. There was no mechanism for tracking total number of FWS hours worked to ensure the student would not go over the maximum hours. Also, documentation of student payments did not differentiate between FWS and college work program. CSC's Policy and Procedures Manual states that "Federal Work Study is awarded after students obtain campus employment," however it does not state if FWS eligibility is determined before or after the student begins employment.

Required Action: CSC must review, revise and submit a copy of its updated policies and procedures related to its FWS awarding practices to ensure funds are awarded and disbursed according to regulations. CSC must review its 2011-2012 and 2012-2013 FWS timesheet records to ensure student time records are available on an individual student basis with daily totals for hours worked and can substantiate what portion was paid using FWS funds. If CSC cannot substantiate the hours previously paid to students using FWS funds, CSC must make the necessary payroll adjustments to ensure the FWS fund accurately reflects allowable FWS expenditures as prescribed by Federal guidelines in *34 C.F.R. § 675, Subpart A*. CSC must reimburse the FWS fund with institutional funds for any overpayments identified. Additionally, CSC must provide a detailed explanation of its review, along with supporting documentation.

Finding 7. Improper FWS Job Classifications—Community Service Employees

Citation: An institution must use at least seven percent of the sum of its initial and supplemental FWS allocations for an award year to compensate students employed in community service activities. In meeting this community service requirement, an institution must include at least one reading tutoring project that employs one or more FWS students as reading tutors for children who are preschool age or are in elementary school; or Family Literacy project that employs one or more FWS students in family literacy activities.

34 C.F.R. § 675.18(g)(1).

In meeting the seven percent community service expenditure requirement above, students may be employed to perform civic education and participation activities in projects that (A) Teach civics in schools; (B) Raise awareness of government functions or resources; or (C) Increase civic participation. *34 C.F.R. § 675.18(g)(4)(i).*

Noncompliance: Although CSC completed its 2011-2012 FISAP to reflect the institution met the community service requirement, program reviewers were not provided evidence to support this information. CSC indicated on its FISAP the utilization of five FWS students as reading tutors, there was no documentation provided to reviewers to reflect the student's class in the category met the requirement.

Required Action: CSC must review its policies and procedures related to the proper placement of community service positions and literacy tutors to ensure appropriate data is collected and reported in relation to community service workers and the seven percent expenditure requirement of the Department.

With its response to this finding, CSC must submit copies of each job description and amounts earned related to students working in community service and literacy positions, as well as policies and procedures that will ensure that FWS job descriptions are maintained and that students will be appropriately classified for FISAP and FWS reporting purposes.

Finding 8. Inadequate Federal Supplemental Educational Opportunity Grant (FSEOG) Awarding Policy and Procedures

Citation: In selecting among eligible students for FSEOG awards in each award year, an institution shall select those students with the lowest EFC who will also receive Federal Pell Grants in that year. If the institution has FSEOG funds remaining after giving FSEOG awards to all the Federal Pell Grant recipients at the institution, the institution shall award the remaining FSEOG funds to those eligible students with the lowest EFC who will not receive Federal Pell Grants. If an institution's allocation of FSEOG funds is directly or indirectly based in part on the financial need demonstrated by students attending the institution as less-than-full-time or independent students, a reasonable portion of the allocation must be offered to those students. *34 C.F.R. § 676.10 (a)(1)(2)(b).*

An institution may award an FSEOG for an academic year in an amount it determines a student needs to continue his or her studies. However, an FSEOG may not be awarded for a full academic year that is less than \$100.00 or more than \$4,000.00 except for the maximum amount of the FSEOG may be increased from \$4,000.00 to as much as \$4,400.00 for a student participating in a program of study abroad that is approved for credit by the home institution, if reasonable costs for the study abroad program exceed the COA at the home institution. For a student enrolled for less than a full academic year, the minimum allowable FSEOG may be proportionately reduced. *34 C.F.R. §676.20.*

Noncompliance: CSC's FSEOG packaging policy for the 2011–2012 and 2012–2013 award years does not provide for award amounts and preferential treatment is given to continuing students.

Students #16: This student had an 1619 EFC for the 2011–2012 award year. CSC failed to provide documentation demonstrating why this student received an FSEOG award of \$750.00 when some students with a 0 EFC were not awarded FSEOG.

Student #32: This student had an 1877 EFC for the 2012–2013 award year. CSC failed to provide documentation demonstrating why this student received an FSEOG award of \$75.00 when some students with a 0 EFC were not awarded FSEOG.

This student is also cited in Finding 10.

Student #41: This student had a 0 EFC for the 2012–2013 award year but was not awarded FSEOG. CSC did not document the reason for not awarding FSEOG funds to this student.

This student is also cited in Findings 1, 2, 8, and 12.

Required Action: In response to this report, CSC must provide an explanation regarding the students referenced above as well as provide revised policies and procedures which ensure that students will be properly and consistently awarded FSEOG funds in accordance to federal regulations.

Finding 9. Inadequate Federal Perkins Loans Awarding Policy and Procedures

Citation: Federal regulations require an institution to sign a Program Participation Agreement (PPA) in order to participate in the Federal Perkins Loan Program. By signing a PPA to participate in the Federal Perkins Loan Program, an institution agrees to adhere to all stipulations as required by federal regulations.

Among the provisions to which an institution agrees to comply with regard to the Federal Perkins Loan Program, is that an institution shall make Federal Perkins Loans reasonably available, to the extent of available funds, to all students eligible but shall give priority to those students with exceptional financial need. The institution shall define "exceptional financial need" for the purpose of the priority of awarding Federal Perkins Loan funds and the institution shall develop procedures for implementing that priority. If an institution's allocation is directly or indirectly based in part on the financial need demonstrated by students attending the institution as less-than-full-time or independent students, a reasonable portion of the dollar amount of Federal Perkins Loans made must be offered to those students. The institution shall establish selection procedures and these procedures must be in writing, uniformly applied, and maintained in the institution's files. *34 C.F.R. § 674.10.*

Additionally, each institution shall exercise due diligence in collecting Federal Perkins Loans by complying with applicable requirements set forth in federal regulation. An institution shall ensure that information available in its offices, including the admissions, business, alumni, placement, financial aid and registrar's offices, is provided to those offices responsible for billing and collecting Federal Perkins Loans, in a timely manner, as needed to determine: the enrollment status of the borrower; the expected graduation or termination date of the borrower; the date the borrower withdraws, is expelled or ceases enrollment on at least a half-time basis; and the current name, address, telephone number and SSN of the borrower.

34 C.F.R. § 674.41.

Institutions shall establish a repayment plan before a student ceases to be enrolled at least on a half-time basis. *34 C.F.R. § 674.33(a).*

An institution may submit a defaulted loan note to the Secretary for assignment to the United States if the institution has been unable to collect on the loan despite complying with the diligence procedures, including at least a first level collection effort. *34 C.F.R. § 674.5(a)(1).*

Noncompliance: CSC does not have adequate policies and procedures with regard to Federal Perkins Loans. Currently, CSC maintains a cash-on-hand balance of approximately \$60,000.00 instead of having a procedure to reasonably project cash flow to appropriately utilize funds. CSC does not have an awarding methodology that ensures funds are available to all students or give priority to student with exceptional financial need. Additionally, CSC does not have a system by which to monitor Federal Perkins Loan borrowers who unofficially withdraw or a method by which to apprise the appropriate institutional officials so that due diligence efforts and repayment may begin timely. Current institutional procedures also lack a mechanism to trigger when delinquent and defaulted Federal Perkins Loans should be assigned to the Department.

Required Action: CSC must develop policies and procedures that are in compliance with federal regulations pertaining to Federal Perkins Loans. CSC must include an awarding methodology to ensure funds are available to all students, a procedure to reasonably project cash flow to utilize funds, a system by which to monitor students who withdraw from school so that due diligence efforts may begin timely as well as a mechanism to trigger when delinquent and defaulted Federal Perkins Loans should be assigned to the Department. A copy of the updated policies and procedures must be included with CSC's response to this report.

Finding 10. Inadequate Documentation for Professional Judgment (PJ) Decisions

Citation: In general, the financial aid administrator has the authority, on the basis of adequate documentation, to make adjustments on a case-by-case basis to the cost of attendance or the values of the data items required to calculate the expected student or parent contribution (or both) to allow for treatment of an individual eligible applicant with special circumstances. However, regulations do not permit aid administrators to deviate from the contributions expected in the absence of special circumstances. Special circumstances may include tuition expenses at an elementary or secondary school, medical, dental, or nursing home expenses not covered by insurance, unusually high child care or dependent care costs, recent unemployment of a family member or an independent student, a student or family member who is a dislocated worker (as defined in *section 101 of the Workforce Investment Act of 1998*), the number of parents enrolled at least half time in a degree, certificate, or other program leading to a recognized educational credential at an institution with a PPA under *section 487*, a change in housing status that results in an individual being homeless (as defined in *section 103 of the McKinney-Vento Homeless Assistance Act*), or other changes in a family's income, a family's assets or a student's status. Special circumstances shall be conditions that differentiate an individual student from a class of students rather than conditions that exist across a class of students. Adequate documentation for such adjustments shall substantiate such special circumstances of individual students. Financial aid administrators have the authority in such cases to: request and use supplementary information about the financial status or personal circumstances of eligible applicants in selecting recipients and determining the amount of awards; or offer a dependent student financial assistance under *section 428II*, or a Direct Unsubsidized Loan without requiring the parents of such student to file the financial aid form prescribed under *section 483* if the student financial aid administrator verifies that the parent or parents of such student have ended financial support of such student

and refuse to file such form. No student or parent shall be charged a fee for collecting, processing, or delivering such supplementary information. *HEA Sec. 479A(a)*.

Noncompliance: In three instances, CSC did not properly obtain documentation from students and/or document the basis of PJ decisions in student files.

Student #17: A review of the files for the 2011–2012 and 2012–2013 years reflect the financial aid administrator performed a PJ to update the student’s mother’s income due to unemployment. Documentation in the file includes requests from the student’s mother requesting the student have additional Direct Unsubsidized Loan funds based on a PLUS Loan Denial. There is no documentation that the financial aid administrator approved changes made on Transaction 02 of the ISIR.

Student #22: A review of the file for the 2011–2012 year reflects the financial aid administrator performed a PJ for the student. A notation in the file from the financial aid administrator indicates the student’s father was no longer employed and was receiving disability income. Although there is a notation from the financial aid administrator of these circumstances, there is no formal request from the parent for an adjustment of income to be made based on the reduced household income; however, included in the file was a fax from the parent requesting the student receive additional unsubsidized loan funds due to parental reduced income.

This student is also cited in Finding 2.

Student #32: A review of the file for the 2012–2013 year reflects the financial aid administrator performed a PJ for the student. The PJ was processed to award the student Direct Unsubsidized Loan funds in lieu of the parent PLUS Loan. CSC did not require a PLUS denial prior to awarding the additional Direct Unsubsidized Loan funds. This student is also cited in Finding 8.

Required Action: CSC must submit documentation to support the PJ decisions made for the above referenced students. In addition, CSC must review and revise its internal policy and procedures to ensure that the institution collects proper documentation in the future and adequately documents PJ decisions in student files. A copy of the policy and procedures must accompany CSC’s response to this report.

Finding 11. Inaccurate Reporting of Disbursement Dates to the Common Origination and Disbursement (COD) System

Citation: An institution makes a disbursement of Title IV, HEA program funds on the date that the institution credits a student’s account at the institution or pays a student or parent directly with funds received from the Secretary or institutional funds used in advance of receiving Title IV, HEA program funds. *34 C.F.R. § 668.164(a)*.

A school participating in the Direct Loan Program shall ensure that any information it provides to the Secretary in connection with loan origination is complete and accurate. A school shall originate a Direct Loan while the student meets the borrower eligibility requirements of 34 C.F.R. § 685.200. A school shall provide to the Secretary borrower information that includes but is not limited to:

- The borrower's eligibility for a loan, as determined in accordance with 34 C.F.R. § 685.200 and 34 C.F.R. § 685.203;
- The student's loan amount; and
- The anticipated and actual disbursement date or dates and disbursement amounts of the loan proceeds. 34 C.F.R. § 685.301(a).

34 C.F.R. § 690.83 require institutions to submit a student's payment data (including disbursement dates) to the Secretary by the reporting deadlines published in the Federal Register. Institutions are required to submit Federal Pell Grant and/or Direct Loan disbursement records to the COD system no later than 30 days after making a disbursement or becoming aware of the need to adjust a student's previously reported disbursement information. The disbursement date to be reported to COD is the date that the institution credits funds to a student's account or pays funds to a student or parent directly. *COD Technical Reference, 2010-2011, Volume 2.*

Noncompliance: CSC did not accurately report disbursement dates to COD. The following chart illustrates a sample of the differences between COD and student account card dates for Title IV, HEA disbursements:

Student Number	Program	Net Amount	COD Disbursement Date	Student Account Disbursement Date
#1	Direct Unsubsidized Loan	\$995	10/03/2011	10/08/2011
#1	Direct Subsidized Loan	\$1,742	10/03/2011	10/08/2011
#1	Direct Unsubsidized Loan	\$995	02/15/2012	02/16/2012
#1	Direct Subsidized Loan	\$1,742	02/15/2012	02/16/2012
#3	Direct Subsidized Loan	\$2,239	10/10/2011	10/13/2011
#3	Direct Unsubsidized Loan	\$995	10/10/2011	10/13/2011
#3	Direct Subsidized Loan	\$2,239	02/08/2012	02/10/2012
#3	Direct Unsubsidized Loan	\$995	02/08/2012	02/10/2012
#4	Direct Subsidized Loan	\$2,250	09/12/2011	09/15/2011
#4	Direct Subsidized Loan	\$2,155	01/12/2012	01/17/2012
#6	Direct PLUS Loan	\$5,850	09/26/2011	09/29/2011
#6	Direct PLUS Loan	\$5,850	02/08/2012	02/10/2012

Student #4 is also cited in Finding 4

Required Action: CSC must revise its COD reporting policy and procedures to ensure the institution accurately reports to COD the date the institution disburses Title IV, HEA program funds to each student's account. A copy of the revised policy and procedures must accompany CSC's response to this report.

Finding 12. Incorrect National Student Loan Data System (NSLDS) Reporting

Citation: Federal regulations state that a school shall:

- Upon receipt of a student status confirmation report from the Secretary, complete and return that report to the Secretary within 30 days of receipt; and
- Unless it expects to submit its next student status confirmation report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct Subsidized, Unsubsidized, or PLUS Loan, or a has been made to or on behalf of a student who:
 - Enrolled at that school but has ceased to be enrolled on at least a half-time basis;
 - Has been accepted for enrollment at that school but failed to enroll on at least a half-time basis for the period for which the loan was intended; or
 - Has changed his or her permanent address. *34 C.F.R. § 685.309.*

Noncompliance: CSC failed to report correct enrollment status information to NSLDS for two students.

Student #19: The student withdrew August 30, 2011. However, CSC indicated the student's last date of attendance was May 21, 2011, the end of the previous term.

This student is also cited in 1, 2, and 5.

Student #41: The student withdrew March 13, 2013. However, CSC indicated the student's last date of attendance was March 18, 2013, the school's determination date.

This student is also cited in Findings 1, 2, and 8.

Required Action: CSC must update the last date of attendance of the above referenced students in NSLDS. CSC must also review its procedures for reporting enrollment status changes to NSLDS and, as necessary, revise them. A copy of CSC's policy and procedures should accompany the response to this report.